

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ANILDA RODRIGUES, and SARAH
TALBOTT, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BOSTON COLLEGE,

Defendant.

Civil Action No. 1:20-cv-11662-NMG

**DECLARATION OF GAUTAM YADAMA IN SUPPORT OF DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT**

I, Gautam Yadama, declare:

1. I am currently the Dean of the School of Social Work at Boston College.¹ In my role as Dean of the School of Social Work, I am familiar with the School of Social Work's communications to its students, and the email distribution lists used for those communications. I submit this declaration in support of Defendant's Motion for Summary Judgment. The following facts are true and correct to the best of my knowledge, information, and belief.

2. I have reviewed Metlitsky Decl., Exs. 15 and 16, which are copies of emails related to a letter I sent on June 24, 2020. Metlitsky Decl., Ex. 15 is a copy of an email I sent on June 23, 2020. It attaches the final version of a letter to be sent to students at the School of Social Work the following morning. Metlitsky Decl., Ex. 16 is a copy of an email my colleague sent on June 23, 2020. It attaches two lists of email addresses to whom my letter would be sent. Because Ms. Sarah Talbott's email address is listed in the first attachment, she would have received my letter, which was sent on June 24, 2020.

3. I have reviewed Metlitsky Decl., Ex. 17, which is a copy of a communication sent to the School of Social Work's distribution list, sw_all@listserv.bc.edu, on June 29, 2020. The sw_all@listserv.bc.edu distribution list includes all students currently enrolled in the School of Social Work at the time a particular communication is sent. Because Ms. Sarah Talbott was enrolled in the School of Social Work on June 29, 2020, she would have received this communication.

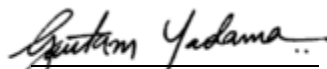
4. I have reviewed Metlitsky Decl., Ex. 23, which is a copy of a communication sent to the School of Social Work's distribution list, sw_all@listserv.bc.edu, on October 19, 2020.

¹ The Trustees of Boston College is the legal entity comprising Boston College, and is the proper party to this litigation.

The sw_all@listserv.bc.edu distribution list includes all students currently enrolled in the School of Social Work at the time a particular communication is sent. Because Ms. Sarah Talbott was enrolled in the School of Social Work on October 19, 2020, she would have received this communication.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 11, 2024 in Boston, Massachusetts.


Gautam Yadama

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on July 11, 2024.

/s/ Anton Metlitsky
Anton Metlitsky (*pro hac vice*)